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U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

JAN 27 2016

CLERK, U.S. DISTRICT COURT
By AN 4:04 p.m.
Deputy

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

JAMES GATLIN (2)

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No. 4:15-CR-152-A-2

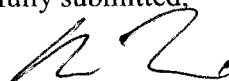
**DEFENDANT'S MOTION FOR LEAVE
TO FILE AN OBJECTION TO THE PRESENTENCE REPORT OUT OF TIME**

COMES NOW, JAMES GATLIN, Defendant, by and through the undersigned counsel, and respectfully moves for leave to file an objection to the presentence report out of time:

1. Defendant is currently scheduled for sentencing on Friday, January 29, 2016.
2. Counsel sincerely apologizes for the belated nature of this filing.
3. Counsel respectfully submits that he makes but a single objection on Defendant's behalf, and one requested correction of a factual matter, and that it is unlikely to occasion any delay. Additionally, the Government is unopposed to the motion.

Accordingly, counsel respectfully requests that the Court grant him leave to file his objection to the presentence report out of time.

Respectfully submitted,



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CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for the Government, A.U.S.A. Shawn Smith, regarding Defendant's request, and that he is UNOPPOSED.



MICHAEL LEVINE

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2016, I had this document hand-delivered to the chambers of the Honorable JOHN H. MCBRYDE, United States District Court Judge. I also served this document upon Assistant United States Attorney Shawn Smith by e-mail, at shawn.smith2@usdoj.gov as well as upon U.S.P.O. Mirenda Kirksey by e-mail, at mirenda_kirksey@txnp.uscourts.gov.



MICHAEL LEVINE